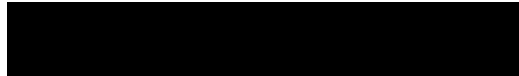


**REDACTED**

**EXHIBIT 2**





RESTRICTED – ATTORNEYS’ EYES ONLY **REDACTED**

4. As one of the Managing Directors of TQ Delta, I oversee all aspects of TQ Delta’s business, including but not limited to decision-making concerning TQ Delta’s strategic direction, patent licensing and acquisition strategy, financial matters, and enforcing TQ Delta’s patents against infringers who are unwilling to obtain a license on fair and reasonable terms. My co-Managing Director, Abha Divine, shares in these duties. She lives and works in Austin, Texas. I have relevant knowledge concerning at least the Patents-in-Suit, TQ Delta’s licensing activities, and TQ Delta’s pre-suit efforts to license its patent portfolio to CommScope and Nokia.

5. I understand that CommScope has indicated its belief that I am a witness having relevant information concerning the above-referenced lawsuit. I also understand that the Court may consider my convenience and willingness to appear for trial in connection with its decision on a motion to transfer venue to the District of Delaware that CommScope has filed in the above-captioned lawsuit. I understand that the trial of this case is currently scheduled for January 2, 2023, in Marshall, Texas. If the trial of this lawsuit is held in Marshall, Texas, and the parties request my appearance as a witness, I am willing to appear in person, without being served with a subpoena, to testify at trial, and such live appearance will not be inconvenient for me. Attending a trial in Marshall would be much more convenient and less costly for me than if the trial were held in the District of Delaware. Because I live and work much closer to the Marshall courthouse than Delaware, there would be significant savings in travel time and cost. Also, I participate in [REDACTED]

[REDACTED] If the trial were held in Marshall, I would be able to return quickly to Plano [REDACTED] which would not be true if I had to attend a trial in Delaware.

RESTRICTED – ATTORNEYS' EYES ONLY **REDACTED**

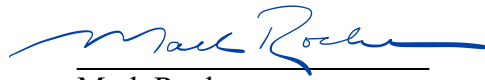
6. At my home office in Plano, including when this lawsuit was filed in August 2021, I maintain files and emails pertaining to TQ Delta which are stored locally on my computer. These files are mirrored on Dropbox, a cloud-based file storage platform. The emails are stored on Microsoft 365, which is also a cloud-based platform. Additionally, all of TQ Delta's shared files are stored locally on my computer, and they are also available on Dropbox. Any changes made to any of the shared files by anyone are nearly instantly synchronized to my local computer.

7. TQ Delta's electronic files consist primarily of patent purchase documents, patent license and settlement agreements from prior patent enforcement actions in federal court, financial records, copies of TQ Delta's patents with prosecution materials, and emails, including emails and/or documents concerning TQ Delta's pre-suit efforts to license its patent portfolio to CommScope and Nokia, the Patents-in-Suit, this litigation, and TQ Delta's licensing and other business activities.

8. I also keep paper copies of important TQ Delta documents in my home office in Plano. These paper copies are not merely printed copies of electronic documents; they are the original documents that will need to be physically transported to trial. Examples of such documents include ribbon copies of certain Patents-in-Suit.

I declare under the penalty of perjury under the laws of the United States of America that the preceding is true and correct.

Date: February 22, 2022

  
Mark Roche